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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

<p>Juliet Kniley,</p> <p>Plaintiff,</p> <p>v.</p> <p>Citibank, N.A. et al,</p> <p>Defendants.</p>	<p>Case No: 3:14-cv-05294-WHA</p> <p>JOINT MOTION FOR ORDER CONTINUING DEFENDANT, CITIBANK, N.A.'S APRIL 23, 2015 FED. R. CIV. P. 11(B) MOTION FOR SANCTIONS TO MAY 7, 2015 [LOCAL RULE 7-12]</p> <p>Date: April 23, 2015 Time: 8:00 AM Courtroom: 8, 19th Floor</p> <p>HON.: WILLIAM ALSUP</p>
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1 On December 31, 2014, Plaintiff filed her First Amended Complaint in this
2 matter. See Dkt. #10. On or about March 19, 2015, Citibank, N.A. ("Defendant"),
3 filed a Fed R. Civ. P. 11(b) Motion for Sanctions against Plaintiff's counsel. See
4 Dkt. #41. Defendant's Fed R. Civ. P. 11(b) Motion for Sanctions is set to heard at
5 8:00 AM on April 23, 2015.

6 Plaintiff's counsel, whom plans on being present at the Fed R. Civ. P. 11(b)
7 Motion for Sanctions hearing date, will be in Cancun, Mexico on April 23, 2015,
8 for the wedding of Sara Khosroabadi, an Associate with Plaintiff's counsel's law
9 firm, Hyde & Swigart. As a result, Plaintiff's counsel will be unable to participate
10 at the April 23, 2015 Fed R. Civ. P. 11(b) Motion for Sanctions hearing date.
11 Similarly, counsel for Defendant will be attending a family wedding the following
12 week in Florida. Accordingly, the soonest available date for the parties is May 7,
13 2015.

14 Plaintiff and Defendant, by and through their counsel, hereby stipulate to a
15 continuance of Defendant's April 23, 2015 Fed R. Civ. P. 11(b) Motion for
16 Sanctions hearing date to May 7, 2015, at 8:00 AM, in accordance with Your
17 Honor's scheduling notes, and respectfully request an Order approving these
18 circumstances.

19 WHEREFORE, for the foregoing reasons, the parties respectfully request an
20 Order approving the Parties stipulation and a continuance of Defendant's Fed R.
21 Civ. P. 11(b) Motion for Sanctions hearing date to May 7, 2015.

22
23 **Stroock & Stroock & Lavan**
24 **LLP**

25 Date: April 7, 2015

26 By: /s/ Raymond A. Garcia, Esq.
27 Raymond A. Garcia
28 Attorneys for Defendant,
Citibank, N.A.

Hyde & Swigart

Date: April 7, 2015

By: /s/ Crosby S. Connolly
Crosby S. Connolly
Attorneys for Plaintiff,
Juliet Kniley

Signature Certification

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Raymond A. Garcia, counsel for Defendant, and that I have obtained Mr. Garcia's authorization to affix his electronic signature to this document.

Dated: April 7, 2015

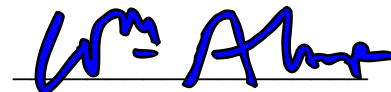
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By: /s/ Crosby S. Connolly
Crosby S. Connolly
Attorney for Plaintiff

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. Defendant, Citibank, N.A.'s April 23, 2015 Fed R. Civ. P. 11(b) Motion for Sanctions hearing date is rescheduled to May 7, 2015 at ~~8:00 AM~~ 2:00 P.M.

Date: April 13, 2015.



HON. William Aslup